

***Remarks***

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 10-18 are pending in the application, with claim 10 being the independent claim. Claims 1-9 and 19-55 are sought to be cancelled without prejudice to or disclaimer of the subject matter therein. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

***Cancelled Claims***

By the foregoing amendment, Applicants have cancelled claims 1-9 and 19-55 without prejudice to or disclaimer of the subject matter therein. Although Applicants do not agree with the Examiner's rejections of these claims, Applicants have nevertheless cancelled these claims in order to focus prosecution on a subset of the originally filed claims and to thereby expedite allowance of the remaining subject matter. Applicants hereby expressly reserve the right to present the cancelled subject matter in a continuation or divisional application.

Because claims 1-9 and 19-55 have been cancelled, each of the rejections of these claims under either 35 U.S.C. § 102 or § 103 has been rendered moot. Accordingly, Applicants respectfully request that these rejections be withdrawn.

***Rejections under 35 U.S.C. § 102***

The Examiner has rejected claim 10 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,418,440 to Kuo *et al.* (hereinafter, "Kuo"). Applicants have carefully considered the Examiner's rejections, but, for the reasons set forth herein, respectfully traverse.

Kuo is directed to a system for performing automated dynamic dialogue generation for implementing an interactive dialogue between a human and a machine. *See* Kuo, Abstract, col. 4, ll. 39-41. The system described by Kuo includes a profile manager that generates and maintains a user profile, which is defined as "a model of the user's intent, both in types of services desired, as well as in preferences for service organization and presentation." Kuo, col. 4, ll. 44-48. To generate the user profile, the profile manager "collects three main types of information about the user--a set of topics, subtopics, and keywords, as well as the desired presentation format." Kuo, col. 5, ll. 29-32. An information services manager uses the user profile to "collect, prune, and organize available information services" to create "a subset of services/information that the user wants." Kuo, col. 7, ll. 16-23. An auto dialogue generator then uses the user profile and the identified set of available services/information to generate "a user-customized set of Dialogue States that define possible dialogue flow between the user and the system." Kuo, col. 4, ll. 56-60. Thus, as set forth in Kuo, the user profile is used to determine the both the content and format of an automatically-generated dialogue.

In contrast to Kuo, Claim 10 recites a method of providing a voice user interface (VUI) that includes:

creating a user profile having preference information for a user;  
and  
providing a *virtual host with a consistent personality defined in accordance with the user profile.*

(Emphasis added). Thus, unlike Kuo, in which a user profile is used to determine only the content and format of an automatically-generated dialogue, the invention recited in claim 10 uses a user profile to provide "a virtual host with a consistent personality." As explained in the specification of the present application:

In consideration of the fact that personality is a significant aspect of spoken discourse, embodiments of the system are implemented so that a user can select one or more virtual hosts with difference personalities. Referring to FIG. 3A, a user is able to indicate in his or her [user] profile specific character traits such as tone 321, sex 322, accent 323, formality 324, speed 325, character 326, and background 327 to develop a personality for the VUI host.

The result of the personality development process is a back-story or mini-biography of the host with whom the user will interact. In some embodiments, the back-story is thorough enough to capture specific traits. For example, the back-story would provide how formal, humorous, helpful, eager, or businesslike the host may act. With this information available, the system maintains consistency throughout the VUI levels and makes decisions about prompt wording and the structure and frequency of help prompts, for example. While a user has the choice of selecting from different virtual hosts, once a virtual host is selected the user will be interacting with the selected host who will maintain a consistent personality, unless otherwise changed by the user.

See Specification, ¶¶ 0087-0088. Kuo does not teach or suggest anything concerning defining various personality traits of a voice user interface (VUI). Consequently, Kuo does not provide a solution to some of the primary problems addressed by the invention of claim 10—namely, that "[i]n interacting with the users, many of the current VUIs are

rigid, monotonous, repetitious, and basically inhuman" and that "current VUIs do not have a well-defined human personality that can interact with a user in a natural conversational style and adapt to the user needs and environment." *See* Specification, ¶¶ 0006-0007.

According to the Examiner, Kuo teaches the step of "providing a virtual host with a consistent personality defined in accordance with [a] user profile" as recited by claim 10 because Kuo teaches "allowing an agent with a personal information defined in accordance with the user profile," citing to the text at column 5, lines 10-28, of Kuo. *See* Office Action at ¶ 5. To the extent that Applicants can understand the Examiner's assertion, Applicants respectfully disagree. In the text referred to by the Examiner, a user provides personal information to a profile manager so that a computer agent (the "information services manager") can later collect information that the user has not explicitly requested for presentation to the user. The providing of personal information to the profile manager in this fashion has nothing to do with "providing a virtual host with a consistent personality defined in accordance with a user profile" as claimed.

Because Kuo does not teach or suggest each and every element of claim 10, it cannot anticipate that claim. Accordingly, the Examiner's rejection of claim 10 is traversed and Applicants respectfully request that the rejection be withdrawn.

***Rejections under 35 U.S.C. § 103***

The Examiner has further rejected:

- claim 11 under 35 U.S.C. § 103(a) as being unpatentable over Kuo in view of U.S. Patent No. 6,301,339 to Staples *et al.*,

- claim 12 under 35 U.S.C. § 103(a) as being unpatentable over Kuo in view of U.S. Patent No. 5,189,702 to Sakurai *et al.*,
- claim 13 under 35 U.S.C. § 103(a) as being unpatentable over Kuo in view of U.S. Patent No. 5,768,508 to Eikeland,
- claim 14 under 35 U.S.C. § 103(a) as being unpatentable over Kuo in view of U.S. Patent No. 5,911,043 to Duffy *et al.*,
- claim 15 under 35 U.S.C. § 103(a) as being unpatentable over Kuo in view of U.S. Patent No. 6,366,882 to Bijl *et al.*,
- claim 16 under 35 U.S.C. § 103(a) as being unpatentable over Kuo in view of U.S. Patent No. 4,531,184 to Wigan *et al.*, and
- claims 17 and 18 under 35 U.S.C. § 103(a) as being unpatentable over Kuo in view of U.S. Patent No. 4,531,184 to Wigan *et al.* and further in view of U.S. Patent No. 6,334,103 to Surace *et al.* and further in view of U.S. Patent No. 5,029,085 to Ito.

See Office Action at ¶¶ 10-16. For the reasons set forth below, Applicants respectfully traverse these rejections.

Each of claims 11-18 depends from claim 10 and therefore includes the step of "providing a virtual host with a consistent personality defined in accordance with the user profile." As noted above, Kuo does not teach or suggest this step. Furthermore, none of the additional references cited by the Examiner in rejecting these dependent claims provides the missing teaching or suggestion. Because none of the combinations identified by the Examiner teach "providing a virtual host with a consistent personality defined in accordance with the user profile," the Examiner has not set forth a *prima facie* case of obviousness with respect to any of dependent claims 11-18. Accordingly, the Examiner's rejections of claims 11-18 are traversed and Applicants respectfully request that the rejections be withdrawn.

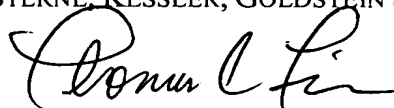
***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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Date: 5/20/04

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